

January 4, 2005

California Regional Water Quality Control Board, Los Angeles Region Mr. David Hung, Chief Undustrial Permitting Unit 320 W. 4th Street, Suite 200 Los Angeles, CA 90013

RE: Addendum to Request for Schedule Phase II 316(b)

Dear Mr. Hung,

As per the request you made at the Coastal Power Plant Entrainment and Impingement meeting on December 15<sup>th</sup> 2004, please accept this addendum to the Request for Schedule submitted to your office on November 3<sup>rd</sup> 2004.

As you are aware, collecting, generating, compiling and analyzing the large amount of information required by the Phase II 316(b) rule will require a substantial effort on the part of the three affected AES Power Plants. AES has requested that the information required by 40 CFR 125.95 be submitted to you no later than January 7, 2008. To help us comply with these requirements AES has requested proposals from the following contractors;

EPRI Solutions / Alden Research Labs The URS Corporation The Black and Veatch Corporation ENSR International

AES believes that each of these contractors possess the experience and skills necessary to develop and implement a compliance strategy under the Phase II 316(b) rulemaking. It is our intention to have a contract signed with one of these consultants by the end of January 2005.

At this point in time AES does not know which compliance options it will follow to achieve compliance with Phase II 316(b). It is the general consensus that the dollar value to install and operate technologies that would bring the generating stations into compliance will be substantially higher than those predicted by the USEPA. Therefore it is believed that AES will at some point evaluate both the technology option and the option of the Site-Specific Requirements and possible Restoration Plans.

Because the Phase II rule is new and untried, we foresee the need to coordinate closely with your department as we collect the necessary information, analyze it, and determine what combination of technology, operational measures, or restoration measures will best meet the Phase II rule for the AES facilities. To assure the standards of the new regulations are met, AES proposes meetings with Regional Board Staff a minimum of 3 times during each year to detail the milestones and accomplishments that have been completed, and those that will need to be completed in the next time period.

Again, we request that we be allowed until January 7, 2008, to submit the information required for a permit application by the Phase II Rule, 40 CFR Part 125 Subpart J.

Sincerely.

Steve Maghy Environmental Manager

AES Southland LLC



In initial conversations with the above consultants the following time table for compliance was suggested. It should be noted that the time table is an estimate and considered <u>compressed</u> by all consulted contractors. Actual tasks may vary as to completion times.

## **Estimated Time Table**

Task	AES Alamitos G.S.	AES Redondo Beach G.S.
Kick off Meeting	upon signing contract	upon signing contract
Establish Baseline Conditions	2 months	2 months
Determine Compliance Alternatives	4 months	4 months
Submit PIC	2 months	2 months
Receive PIC Approval	2 months	2 months
Initiate IM & E Sampling	2 months	2 months
Complete IM & E Sampling	12 months	12 months
Draft IM & E Characterization Report	4 months	4 months
Draft Design Construction Tech. Plan	1 months	1 months
Draft Tech. Installation and Operation Plan	2 months	2 months
Draft Cost-Benefit Assessment (if Necessary)	1 months	1 months
Draft Restoration Plan (if Necessary)	1 months	1 months
Draft Verification Monitoring Plan	1 months	1 months
Submit Comprehensive Demonstration Plan	4 months	4 months
Total	36 months	36 months